

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:) Bankruptcy No. 18-20778-GLT
Elleni Berger and)
Randy D. Berger,) Chapter 13
Debtor,)
Nationstar Mortgage LLC)
d/b/a Mr. Cooper)
Movant,) Related to claim No: 19
vs.)
Elleni Berger and Randy D. Berger)
Ronda J. Winnecour, Chapter 13 Trustee,)
Respondent.) Document No.

DECLARATION THAT THE EXISTING CHAPTER 13 PLAN IS SUFFICIENT

AND NOW, comes the Debtors, Elleni Berger and Randy D. Berger by and through their attorneys, CALAIARO VALENCIK and David Z. Valencik, and presents the following:

1. This case was filed on March 1, 2018, under Chapter 13 of the United States Bankruptcy Code.
2. A Notice of Mortgage Payment Change was filed by Nationstar Mortgage LLC d/b/a Mr. Cooper on April 5, 2019, which changed the escrow payment less than \$5.00 per month.
3. The Debtors' current plan is overfunded and there is no reason to amend the Debtor's Chapter 13 Plan at this time.

Respectfully submitted,

Dated: April 26, 2019

BY: /s/ Donald R. Calaiaro
Donald R. Calaiaro, Esquire, PA I.D. #27538
[**dcalaiaro@c-vlaw.com**](mailto:dcalaiaro@c-vlaw.com)
BY: /s/ David Z. Valencik
David Z. Valencik, Esquire, PA I.D. #308361
[**dvalencik@c-vlaw.com**](mailto:dvalencik@c-vlaw.com)
CALAIARO VALENCIK
428 Forbes Avenue, Suite 900
Pittsburgh, PA 15219-1621
(412) 232-0930